

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES SOTO,)	
)	
<i>Plaintiff,</i>)	No. 24-cv-10869
)	
v.)	Hon. Martha M. Pacold
)	Magistrate Hon. Laura K. McNally
WILLIAM FOSTER, <i>et al.</i> ,)	
)	JURY TRIAL DEMANDED
<i>Defendants.</i>)	

DAVID AYALA,)	
)	No. 24-cv-12800
)	
<i>Plaintiff,</i>)	
)	Hon. Martha M. Pacold
v.)	Magistrate Hon. Laura K. McNally
)	
WILLIAM FOSTER, <i>et al.</i> ,)	JURY TRIAL DEMANDED
)	
<i>Defendants.</i>)	

JOINT STATUS REPORT

Pursuant to this Court's September 2, 2025 Minute Entry (*Soto* Dkt. 197) and July 7, 2025 Minute Entry (*Ayala* Dkt. 140), the parties jointly submit this status report:

1. Since the last status report, the parties have continued exchanging written discovery, issuing document subpoenas, and conducting several third-party depositions.
2. To date, the parties have completed depositions of the following third parties:
 - a. Robert Jaquez
 - b. Thomas Gutierrez
 - c. Juan Padilla
 - d. Vince Hodge
 - e. Wally Cruz
 - f. Hugo Flores
 - g. Salvador Guzman
 - h. Randy Hodge

- i. Ruben Palomo
- j. Mario Abarca

3. Additionally, the parties have scheduled the following upcoming depositions:

<i>Deponent</i>	<i>Deposition Date</i>	<i>Taking Party</i>
Isabelle Gomez	November 6, 2025	Plaintiff
Roger Ramirez	November 10, 2025	Defendants
Defendant Ernest Hernandez	November 17, 2025	Plaintiff
Defendant William Foster	December 9, 2025	Plaintiff
Defendant Jack Smeeton	January 6, 2026	Plaintiff
Defendant Gregg Owen	January 9, 2026	Plaintiff

4. Lastly, the parties have blocked off more dates for depositions and have jointly designated certain dates as “Plaintiff-led” and others as “Defense-led” as outlined below.

<i>Plaintiff</i>	<i>Defendants</i>
<ul style="list-style-type: none"> • November 3rd • November 6th • November 17th • November 19th • December 9th • December 11th • December 22nd 	<ul style="list-style-type: none"> • November 10th • November 13th • December 3rd • December 5th • December 16th • December 18th • December 29th

5. The other witnesses the parties plan to depose, but have not yet scheduled, include but are not limited to: Lisa Suarez, Johnny Martinez, Robert Villagomez, and Tyrone Ayala. Defendants are also in the process of attempting to certain records of both Plaintiffs from various correctional facilities.

DATED: November 3, 2025

Respectfully Submitted,

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